REMARKS/ARGUMENTS

Claims 1, 5-7, 10-14, 16-17 and 21 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,266,100 B1 (Gloudemans) in view of U.S. Patent No. 6,538,656 (Cheung). Applicant respectfully traverses this rejection. With regard to claim 1, the Office Action concedes that "Gloudermans [sic] does not disclose adjusting a flicker filter based upon the alpha value" as recited by claim 1. Office Action, p. 2. Instead, the Office Action relies on Cheung for such a teaching, stating that "it would have been obvious...to modify Gloudemans' video presentation to adapt Cheung's anti-flutter filtering (98) and a video scaler (104) activities as represented in FIG. 4." Office Action, p. 3. The Office Action further states that Cheung suggests that "filtering along with video scaling provides the desired method of adjusting a flicker filter." Id.

Applicant respectfully disagrees. With respect to Cheung, there is no teaching or suggestion for "adjusting a flicker filter based upon the alpha value" as recited by claim 1. That is, Cheung does not adjust a flicker filter based on an alpha value. To the extent that the Office Action contends that filter (98) is a flicker filter, there is no teaching or suggestion in Cheung that such a filter is adjusted based on an alpha value. Instead, filter (98) of Cheung has coefficients that are samples of an approximately continuous impulse response. Cheung, 9:52-10:4. This in no way teaches or suggests adjusting a flicker filter by an alpha value.

Further, the video scaler (104) of Cheung has no interaction with the output of filter (98). As shown in FIG. 4 of Cheung, these separate components are in no way connected. Thus, contrary to the Office Action's contention, Cheung does

not perform "anti-flutter filtering in conjunction with a video scaler." Office Action, p. 3. Nor does the video scaler (104) teach or suggest adjusting a flicker filter based upon an alpha value. In contrast, the scaler function of the video scaler (104) is a set of sample rate conversion functions: it is not adjusted based on an alpha value. Cheung, 10:27-41.

Nor is there any motivation or suggestion to combine Gloudemans with Cheung. This is especially so, as Gloudemans relates to a system for enhancing video presentation of a live event using a graphic, whereas Cheung relates to an integrated circuit for receiving and processing video and graphics information as used in a set top box.

Thus claim 1 and dependent claims 5-7 patentably distinguish over the proposed combination. Further, independent claims 10 and 17 and claims 11-14, 16 and 21 depending therefrom are patentable for the same reasons.

Dependent claims 5-7 and 21 are further patentable, as they depend from claims 2 and 18, respectively. As the Office Action concedes that Gloudemans and Cheung does not teach or suggest claims 2 or 18, these claims are patentable.

Claims 2-4, 8-9, 15, 18-20, and 22 stand rejected over Gloudemans in view of Cheung and in further view of U.S. Patent No. 6,144,365 (Young). For the same reasons discussed above with regard to claim 1, this rejection is improper.

The rejection of claim 2 is further improper, as Young does not teach or suggest comparing an alpha value to a predetermined threshold value. In this regard, Young does not teach or suggest an alpha value that "indicates how a video signal and a graphics signal are to be combined." *See* claim 1. Instead, the alpha value of Young relates solely to graphics images and the blending of two graphics pixels (and more specifically, colors thereof) as a foreground and background pixel. Young, 1:22-52.

Further, the fact that Young has an alpha blending unit that includes an adder, subtracter, multiplier and divider nowhere teaches or suggests using such components for comparisons with alpha values, threshold values or alpha step values. Nor does Young teach or suggest using an alpha test unit (306), Z compute unit (308) or alpha blending unit (310) to adjust a filter level of a flicker filter. For these further reasons, claims 2-4, 8-9, 15, 18-20, and 22 are patentable.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

Date: September 24, 2003

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